

**United States Bankruptcy Court
Eastern District of Pennsylvania**

In re **Jermaine Elliott**

Debtor

Case
No. **23-10026/amc**
Chapter **13**

**SUPPLEMENTAL STATEMENT FOR
MOTION TO AVOID JUDICIAL LIEN ON REAL ESTATE**

Debtor, by his counsel, Bradly E. Allen files this Supplemental Statement as follows:

1. The fair market value of Debtor's real property as determined by Schedule A of Debtor's Schedules is \$115,000.00.
2. Debtor has the following liens against his property along with the real estate exemption:
 - a. Lakeview Loan Servicing, LLC Mortgage - \$58,789.35
 - b. Citizens Bank Mortgage - \$7,751.98
 - c. Secured creditor Mobile Modular Portable Storage Judgment lien-\$10,345.50
 - c. City of Philadelphia/Water Revenue Bureau lien - \$3,121.65
 - e. Real estate exemption - \$27,900.00

The total of the above liens and real estate exemption is \$107,908.48. As a result, \$7,091.52 of the Judgment lien is not avoidable and \$3,253.98 is avoidable.

Dated: May 18, 2023

/s/Bradly E. Allen, Esquire.

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